

Battaglia, Frank

From: Rick Kowalski <rkowalski@aeiconsultants.com>
Sent: Thursday, August 23, 2018 3:17 PM
To: Tisa, Kimberly; Battaglia, Frank
Cc: Joseph F Guarnaccia; Stephen Graham; Aaron Ting
Subject: Former Ciba-Geigy, Response to EPA re Rail Transport, Cranston, RI
Attachments: Former Ciba-Geigy_180 Mill Street_Cranston RI_Off-site Soil Disposal via Rail.pdf; RE: [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street

Dear Kim and Frank:

The following are our responses to EPA's request for information regarding the proposed use of rail transport for PCB TSCA regulated and RCRA regulated soils from the above referenced site to the Chemical Waste Management disposal facility in Emelle, AL:

1. The name of the transporter is Providence and Worcester Railroad Company
2. The transporter has notified EPA as a PCB transporter and was assigned EPA ID # MAD059020834.
3. A description of how we will manage the transport and loading to prevent the release of PCB contamination to the environment is attached.
4. BASF has obtained RIDEM approval for this option and will comply with any applicable RIDEM requirements (see attached).

Please let us know if you have any questions or require any further information. Thanks,

Richard G. Kowalski, CPG, LSP, CHMM
Senior Hydrogeologist

AEI Consultants
112 Water Street, 5th Floor
Boston, MA 02109

c. 508.951.3673
f. 857.233.5531
www.aeiconsultants.com

RAIL AREA - DBL PLASTIC
INCLUDE IN
RAIL CAR

SEM PLAN (O&M PLAN)
- CAP - OZONE
- RIVER - GLO MONITOR
OZONE SYSTEM

ELUR & SOIL MNGT PLAN



SEMS DocID

650914

Battaglia, Frank

From: Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>
Sent: Wednesday, August 01, 2018 2:06 PM
To: Aaron Ting; Rick Kowalski
Cc: Joseph F Guarnaccia; Stephen Graham; Bob Maddock; kelly.owens@dem.ri.gov
Subject: RE: [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street

Aaron- I have no problem with your Soil Loading Plan as forwarded. Be sure to implement BMPs during activities and PPE for all personnel onsite. Be sure your HASP and Emergency contacts are readily available. The final CMI for Lot 1102 was received on May 22, 2018. There is no formal approval from RIDEM for this SMP. The final Site Wide Remedy Decision will be coming from USEPA Region 1.

Thanks Jeff

From: Aaron Ting <ating@aeiconsultants.com>
Sent: Friday, July 27, 2018 1:48 PM
To: Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>; Rick Kowalski <rkowalski@aeiconsultants.com>
Cc: Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Stephen Graham <sgraham@aeiconsultants.com>; Bob Maddock <bmaddock@strategic-es.com>; Owens, Kelly (DEM) <kelly.owens@dem.ri.gov>
Subject: RE: [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street

Jeff: for your review and DEM approval, please find attached a detailed transportation and loading process related to off-site transportation of impacted soils via rail for the above reference site. Any questions, please let us know. Thank you,

Aaron C. Ting, PE
Project Engineer/Project Manager
AEI Consultants
112 Water Street, 5th Floor
Boston, MA 02109
Mobile: 978.577.7138



From: Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>
Sent: Monday, July 09, 2018 10:47 AM
To: Rick Kowalski <rkowalski@aeiconsultants.com>
Cc: Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Stephen Graham <sgraham@aeiconsultants.com>; Bob Maddock <bmaddock@strategic-es.com>; Aaron Ting <ating@aeiconsultants.com>; Owens, Kelly (DEM) <kelly.owens@dem.ri.gov>
Subject: RE: [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street

Make it detailed and indicate how the soils are to be transported from the site to the rail spur. I am assuming that you will not be going onto the public roads in anyway and you are staying on BASF property. If not, then we might have a problem given the Hazardous Waste Transportation Regulations and manifesting. Where is the closest point the rail spur comes to the site?

From: Rick Kowalski [<mailto:rkowalski@aeiconsultants.com>]

Sent: Monday, July 09, 2018 10:13 AM

To: Crawford, Jeffrey (DEM) <jeff.crawford@dem.ri.gov>

Cc: Joseph F Guarnaccia <joseph.guarnaccia@basf.com>; Stephen Graham <sgraham@aeiconsultants.com>; Bob Maddock <bmaddock@strategic-es.com>; Aaron Ting <ating@aeiconsultants.com>

Subject: [EXTERNAL] : Former Ciba-Geigy, 180 Mill Street

Jeff: BASF is getting ready to begin remedial activities on Lot 1102 at the above referenced site. As part of those activities, off-site transportation of impacted soils via rail is being considered. However, in order to do that, we would need to load the soils onto the rail spur located on Lot 2682 associated with the DEP-regulated Bellefont Pond remediation project. Assuming that BASF provides both the EPA and DEM with a description of how it will manage the transport and loading to prevent contamination of the land surface next to the rail spur, is this option something that DEM is able to approve? Thanks,

Richard G. Kowalski, CPG, LSP, CHMM
Senior Hydrogeologist

AEI Consultants
112 Water Street, 5th Floor
Boston, MA 02109

c. 508.951.3673

f. 857.233.5531

www.aeiconsultants.com [aeiconsultants.com] [na01.safelinks.protection.outlook.com]



Strategic Environmental Services, Inc.

Corporate Headquarters

362 Putnam Hill Road
Sutton, MA 01590

CT Office

128 Wildcat Road
Burlington, CT 06013

(T): 508-757-7782 / (F-MA): 508-363-2346 / (F-CT): 860-673-2823

www.Strategic-es.com

SES Transmittal # - 6

Date- 7/26/18

**Contractor- Strategic Environmental
362 Putnam Hill Road
Sutton, MA**

**Owner- BASF
Engineer- AEI**

**Project - Remediation Services
BASF Facility
180 Mill Street
Cranston, RI**

Submittal No.	Section	Reference Spec
12	01 31 19	Soil Management Plan (Rail Car Loading)



Soil Loading Plan for Loading Rail Cars @ Mill Street

Soil Loading Via Rail

- SES will perform limited vegetation clearing and removal of approx. <30 LF of galvanized steel fence at Lot 2682 in order to create access to load rail cars across the street on Lot 2682, owned by BASF.
- Upon completion of clearing & fence removal SES will establish a soil stockpile management area at the rail spur where loading will take place (see figure, pg3). Management area will consist of 20 mil HDPE liner placed on the existing pavement and the area will be surrounded by staked hay bales. Stockpiles will be covered each day with 6 mil poly sheeting, anchored to prevent dust release.
- SES shall load material from the site (lot 1102) into a dump truck or roll-off Truck and the material will be transported along the private way between the two gates on BASF property (Lot 1102/2682), where it will be dumped on the designated stockpile area adjacent to the gondola car.
- Trucks transporting soil from Lot 1102 to Lot 2682 will be loaded on the decon pad and therefore will not enter the contaminated zone at any during the transportation to the rail lot.
- Soil loads will be covered prior to leaving Site 1102. No soil trucks will traverse across the public roadway (Mill Street), which begins beyond the project limit.
- Each rail car will be lined with a 10-mil poly liner prior to any loading.
- SES will utilize a loader with a bucket scale to perform the loading of soil to the proper weight per rail car.
- The material shall be loaded from the stockpile into the gondola in a neat and orderly fashion as to prevent material from falling out of the loader bucket.
- This Poly sheeting prevent any soil from impacting the clean ground surface while loading operations are being conducted. Poly sheeting will be placed between gondola and stockpile (see figure 3) to collect any spillage.
- SES will prepare proper shipping manifest for each rail car leaving site.
- Waste from decontamination efforts will be managed off site as TSCA regulated material for incineration in accordance with 40 CFR 761.60 and other applicable sections.
- At the end of the project, final decontamination procedures must be followed according to 40 CFR 761 Subpart S. This requires removal of visible residue, double washing and rinsing of equipment and disposal of collected soils. SES will collect wipe samples from surfaces of construction equipment (loader) and metal or plastic tools.

Stockpile area where SES will dump soil to be loaded into Rail Cars. Soil will be loaded into rail cars via a front end loader

Rail Cars to be loaded. Each car will be lined prior to loading. it is anticipated to have 3 cars on site at a time for loading.

poly sheeting

Property is Subject to a Cross Easement Between Atlantic Tubing & Rubber Co. and Ciba Geigy Corporation as Recorded in Book 437 Page 96, Dated October 6, 1978.

Easement Granted to The Narragansett Electric Company as Recorded in Book 374 Page 11, Dated December 10, 1965.

Truck traffic route. Trucks will be loaded at Lot 1102 and drive over to the stockpile area

BK3803 P97

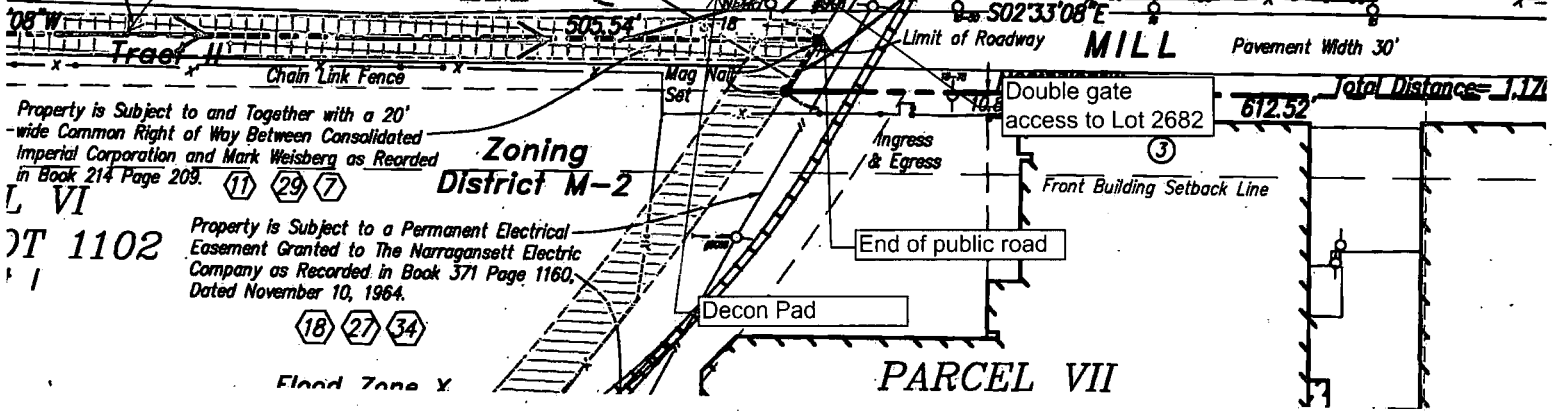
MS, INC.

Mag Nail Set

Ingress & Egress 132.32'

$\Delta = 0175'13"$
 $R = 1,344.85'$
 $L = 29.43'$
 $T = 14.71'$
 $Chd. Brg = S80'43'14"E$
 $Chd. Dist = 29.43'$

PAI PLAT



Property is Subject to and Together with a 20' wide Common Right of Way Between Consolidated Imperial Corporation and Mark Weisberg as Recorded in Book 214 Page 209.

L VI
 OT 1102

Property is Subject to a Permanent Electrical Easement Granted to The Narragansett Electric Company as Recorded in Book 371 Page 1160, Dated November 10, 1964.

Flood Zone X